

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DARRON EASTERLING,

Plaintiff,

v.

WORLD CHAMPIONSHIP WRESTLING, INC.,

TURNER SPORTS, INC. and TURNER

BROADCASTING SYSTEM, INC.,

Defendants.

CIVIL ACTION FILE

NO. 1:00-CV-1715-CC

APPENDIX OF DEPOSITION EXCERPTS

INDEX

1. Deposition of Dewayne E. Bruce
2. Deposition of Joseph N. Hamilton
3. Deposition of Darron Easterling



EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Davis v. World Championship Wrestling, Inc. and Turner
Sports, Inc., Civ. File No. 1-00-CV-1716-CC;

Saengsiphon v. World Championship Wrestling, Inc. and
Turner Sports, Inc., Civ. File No. 1-00-CV-1719-CC;
Speight v. World Championship Wrestling, Inc. and
Turner

Sports, Inc., Civ. File No. 1-00-CV-1718-CC;
Worthen v. World Championship Wrestling, Inc. and
Turner

Sports, Inc., Civ. File No. 1-00-CV-1717-CC;

Reeves v. World Championship Wrestling, Inc. and Turner
Sports, Inc., Civ. File No. 1-00-CV-1720-CC;

Easterling v. World Championship Wrestling, Inc. and
Turner Sports, Inc., Civ. File No. 1-00-CV-1715-CC;

Onoo v. World Championship Wrestling, Inc., and Turner
Sports, Inc., Civ. File No. 1:00-CV-0368-CC;

Norris v. World Championship Wrestling, Inc., and
Turner

Sports, Inc., Civ. File No. 1:00-CV-0369-CC;
Walker v. World Championship Wrestling, Inc., and
Turner

Sports, Inc., Civ. File No. 1:00-CV-0367-CC;

Patterson v. World Championship Wrestling, Inc., Turner
Sports, Inc. and Turner Entertainment Group, Inc.,
Civ. File No. 1:01-CV-1152-CC

DEPOSITION OF DEWAYNE E. BRUCE

NOVEMBER 21, 2002

Premier

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1 A I think probably Hardbody was a little
2 better -- at that time Hardbody was probably a little
3 better on the mic but Chris, he had more high-flying
4 skills than Hardbody. As far as mat wrestling, they
5 were probably pretty equal.

6 Q Okay. Let's move on to Darron Easterling.
7 You said you trained Darron. How would you evaluate
8 Darron?

9 A He was okay.

10 Q Anything else?

11 A I think maybe with a little more training
12 he would have been okay, you know.

13 Q Backing up to Tank Abbott, did they tell
14 you what to do as far as training him?

15 A They came back and gave me a general idea
16 what they wanted and I did the best I could.

17 Q What was that general idea?

18 A Was that, you know, they I guess mainly
19 focused on his shoot fight stuff and they wanted him
20 to get a little more skills as a wrestler and that was
21 pretty much it.

22 Q Now you have got me doing the same thing.
23 I am using "they" too. Who is "they" as far as Tank
24 Abbott?

25 A I am just using "they" as far as the



EXHIBIT / ATTACHMENT

2

(To be scanned in place of tab)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Walker v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 100-CV-0367-CC
Onoo v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 1:00-CV-0368-CC
Norris v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 1:00-CV-0369-CC
Easterling v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 1:00-CV-1715-CC
Davis v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1716-CC
Worthen v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1717-C
Speight v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1718-CC
Saengsiphon v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1719-CC
Reeves v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1720-CC
Patterson v. World Championship Wrestling, Inc., Turner Sports, Inc. and Turner Entertainment Group, Inc., Civ. File No. 1:01-CV-1152-CC

DEPOSITION OF JOSEPH N. HAMILTON
MARCH 22, 2002
1:30 P.M.

COPY



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1 A Uh-huh.

2 Q Okay. How about Bounthan and -- and
3 Lash LaRue?

4 A They are both cruiser weights.

5 Q How would you compare the two?

6 A Well, Lash is far better than Bounthan
7 was.

8 Q In what ways?

9 A He showed more ring savvy and more -- and
10 better -- more ability to adjust and adapt to mistakes
11 that happened in the ring, and he had -- had a greater
12 general knowledge of the holds and the moves.

13 Q Anything else?

14 A That's about it.

15 Q How about Darron Easterling? Did you
16 observe Darron Easterling?

17 A Yep.

18 Q Okay. How did you evaluate him as a
19 wrestler?

20 A How would I evaluate Darron?

21 Q Or how did you?

22 A Darron was a big guy. He had a great body
23 and so on. But Darron was -- was -- I thought was
24 clumsy at times, and he just fell over his own feet
25 sometimes.



EXHIBIT / ATTACHMENT

3

(To be scanned in place of tab)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Davis v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1-00-CV-1716-CC;
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VIDEOTAPED DEPOSITION OF DARRON EASTERLING
MARCH 22, 2002
10:00 A.M.



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1 football player?

2 A Right.

3 Q And how long did you do that?

4 A I think about four years, if I remember
5 correctly.

6 Q Does that take us up to the time when you
7 first became involved with World Championship Wrestling?

8 A Well, actually I did a tryout like in '97,
9 March of '97, and I was still working for him. Yes, I
10 was still working for him then. I think it was like
11 March of '97, somewhere in there, March or February,
12 something like that.

13 Q When did you stop working for Darrian
14 Connor?

15 A Like February of '98.

16 Q Why did you decide to try out for World
17 Championship Wrestling?

18 A The guy that used to wrestle with W.C.W.,
19 Disco Inferno, I knew him because he kept saying -- he
20 used to call me East. East, you should come down there
21 and do wrestling, man.

22 He kept pushing it to me, and finally I asked
23 him, you think I could do good in it? He was like, you
24 should do great. So that's how I got -- became involved
25 in it.

1 Q Disco Inferno, what is his -- do you know
2 what his real name is?

3 A It's Glen. I don't know his last name. I
4 can't remember.

5 Q And how did you know Disco Inferno?

6 A Because the guy he worked for at the time
7 owned a detail, a mobile detail, and he used to come by
8 with the guy that cleaned, to wash the cars at the house
9 I was living -- where I was living.

10 Q Did someone at W.C.W. specifically invite
11 you to a tryout or how did you come to actually go
12 through the process of trying out?

13 A Like I said, Disco, you know, he kept
14 encouraging me like you should go. Then I asked him --
15 you know, I called down to the Plant and they gave me
16 the process. You know, they was like get a physical.
17 They told me to get the money order, cashier's check.
18 So I got all that and took it down there and I went from
19 there.

20 Q How much did you have to pay for the
21 tryout?

22 A Yes.

23 Q How much?

24 A I think it was 200 or 250.

25

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1 those people in the office.

2 Q And what else do you recall, if anything,
3 them telling you that day when they invited you back?

4 A Just like I say, they said we see a lot of
5 potential in you and we could do some things with you,
6 so we would like to have you back. They just told us
7 about the fee. It was a \$3,000 training fee.

8 Q Did they tell you anything about your
9 chances ultimately to become a successful professional
10 wrestler?

11 A They didn't say like -- necessarily say
12 you got a 50 percent chance or whatever, but they were
13 like this is the process you go through in order to have
14 an opportunity.

15 Q At this point did anyone from W.C.W. make
16 any representation to you or lead you to believe that
17 you would make it if you signed up?

18 A All the instructors did.

19 Q By saying what they -- what you already
20 talked about they said to you?

21 A Yeah, that and, you know, they was like,
22 you know, with your body, your stature, you should get a
23 good shot. That's about it.

24 Q And the fee to train was \$3,000?

25 A Right.

1 Q Did they tell you how long? Did they tell
2 you there was a specific period of time that you would
3 be training?

4 A They didn't say specifically but they said
5 -- I asked them I think -- I don't know if I asked them,
6 but if I recall right, they said something like -- you
7 know, like it's about six months. It's anywhere from
8 six to nine months.

9 Q Was there any discussion at that point
10 about what would happen after that six- to nine-month
11 period ended?

12 A Not then.

13 Q Did you pay the \$3,000 fee?

14 A I paid a portion of it.

15 Q How much do you recall you paid?

16 A If I'm not mistaken, 2,300.

17 Q Did you pay it all at once or did you pay
18 it a little, some at first and then some later?

19 A No, I paid all of it at once.

20 Q You paid before you started training?

21 A Like a week before.

22 Q And when did you actually start training?

23 A I'm thinking maybe about a year later,
24 like March of '98, February or March '98.

25 Q Why did you not start training for a year?

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1 A Because I was still working for that guy.
2 They was -- he was paying me pretty decent money at the
3 time so I couldn't just go down there without having any
4 money. Then I had to get the money up to pay the fee.
5 I wasn't sure -- I thought you had to pay it all at once
6 but when I called down there before I paid it, they told
7 me, no, you don't have to pay it all at once.

8 Q At the time you did the tryouts, how much
9 were you making at your other job?

10 A Like 600 a week, I think.

11 Q When you started training, what hours did
12 you -- what was your schedule?

13 A Usually I would go down there probably
14 between 9:00 and 9:30 and leave about -- usually I would
15 leave about 3:00 because I had to go to my other job. I
16 had stopped working for that guy. I had to go to my
17 other job.

18 Q Now what other job was that that you left
19 to go to?

20 A The detailing shop.

21 Q That was in Atlanta?

22 A Yes. Alpharetta.

23 Q Alpharetta?

24 A Right.

25 Q What's the name of the place where you

1 worked?

2 A Showroom Shine.

3 Q When did you start working at Showroom
4 Shine?

5 A Probably maybe April of '98.

6 Q And how long did you work there?

7 A Through maybe sometime in '99.

8 Q You think you worked there longer than a
9 year?

10 A Off and on probably.

11 Q A typical day was starting about 9:00 to
12 9:30 and ending sometime around 3:00 o'clock?

13 A At the Power Plant, yes.

14 Q At the Power Plant. You sometimes worked
15 later at the Power Plant?

16 A Sometimes.

17 Q What's the latest that you went at the
18 Power Plant?

19 A About 5:00.

20 Q You think you ever worked any longer hours
21 than 9:00 to 5:00 at the Power Plant?

22 A No, I don't recall.

23 Q A typical day at the Power Plant, what
24 would you do in a day? How would the day start when you
25 got there?

1 instructors -- well, you know, the official instructors
2 there, I would say Pez Whatley.

3 Q And who were the other instructors?

4 A Mike Wenner and Dewayne Bruce, whatever
5 his last name is, and Jody Hamilton sometimes.

6 Q Were there other people who came in who
7 worked with you from time to time, not on a regular
8 basis?

9 A No, other than like guys that were
10 actually trainees, that was pretty much it. Actually, I
11 would say Hardbody Norris probably worked with me more
12 than anybody.

13 Q Harrison Norris?

14 A Yeah, Harrison Norris.

15 Q How much of an average day was spent
16 actually training, actually doing the training as
17 opposed to setting up or cleaning up?

18 A Like -- I can't really remember to a
19 certain point, but I would say probably about
20 three-and-a-half, four hours.

21 Q Did you spend more time training as
22 opposed to doing the cleanup and setup work or less or
23 about the same?

24 A About the same, I would say.

25 Q Who decided the training schedule?

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1 Q While you were training were you ever
2 injured to such an extent that you had to miss training
3 time?

4 A Yes, one time I had fell on my hip wrong
5 or something and, you know, for about a week I had to
6 take it easy.

7 Q Did you see a doctor for that injury?

8 A No, I didn't. Well, when I went to the
9 doctor about the dehydration, you know, they told me to
10 come back a week later and they did -- you know, they
11 wanted to -- they did like blood work and whatever and
12 then at that time I told them about -- I had like a
13 sharp pain going down my -- and they took x-rays and
14 they said it was no structural damage. Said it might
15 have been a nerve but that's about it.

16 Q Who paid for the doctor?

17 A It was my -- I had insurance then.

18 Q Okay. W.C.W. didn't pay for it?

19 A No.

20 Q While you were training did you have a
21 ring name or character?

22 A I didn't, but I had one in mind.

23 Q Did you ever use it or talk to anybody at
24 W.C.W. about it when you were training?

25 A About it? Just some of the other

1 trainees.

2 Q And what was that character?

3 A BeefMaster.

4 Q When you were training, did W.C.W. provide
5 you with any clothing or equipment to use in your
6 training?

7 A No.

8 Q Other than the job you had with Showroom
9 Shine, did you have any other employment outside of
10 W.C.W. while you were training?

11 A Let me see. Yeah, I used to -- like for
12 this entertainment company -- like go dance at
13 bachelorette parties and stuff. Like sometimes on the
14 weekends at night.

15 MR. RICHARDSON: Could you read back his
16 answer?

17 THE REPORTER: I really didn't understand
18 it.

19 Q BY MR. RICHARDSON: Could you repeat your
20 answer, please.

21 A Oh, I used to work for this entertainment
22 company. I used to like go dance at bachelorette
23 parties sometimes on the weekends.

24 Q Bachelorette parties?

25 A Yes. You know, birthdays, bachelorette

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1 parties.

2 Q That was from time to time? You weren't
3 on a set schedule for that?

4 A No, they would just call and say can you
5 do it and I had to tell them yes or no.

6 Q Is there a particular company or
7 organization that you worked with?

8 A It was -- I think the name of the company
9 was Eastern Onion.

10 Q Eastern Onion?

11 A Yes.

12 Q Any other jobs you had while you were at
13 training at W.C.W.?

14 A I don't think so other than the one I
15 mentioned before.

16 Q Before you began training, was it your
17 understanding that the training program would be six to
18 nine months?

19 A Yes. Like I said, after the tryout when
20 they called us in the office they said usually, you
21 know, that's a good time range, between six and nine
22 months.

23 Q How long did you train with W.C.W.?

24 A March of '99 to like the week they moved
25 to the new training facility. I can't exactly remember,

1 but I remember we were moving the stuff to the new
2 facility.

3 Q You think that was in sometime in '99?

4 A I am thinking it was early '99 or late
5 '98. I think it was early '99, though.

6 MS. ROTHENBERG-WILLIAMS: Can we take a
7 ten-minute break?

8 MR. RICHARDSON: Yes.

9 (A recess was taken.)

10 (Whereupon, the court reporter
11 marked Exhibit 2 for
12 identification.)

13 MR. RICHARDSON: Back from break. I will
14 hand you what's been marked as Defendant's Exhibit 2 and
15 ask you to take a look at that.

16 Q Have you ever seen this document before?

17 A No, but some of the information I
18 remember.

19 Q Do you have any idea who prepared this
20 document?

21 A I think it was one day they were just
22 getting like some -- just wanted to like make up a
23 character and they were saying, you know, write down
24 what your ring name would be. And they were saying like
25 when you put down a hometown, try to put down something

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1 that would like draw, draw a crowd. You know, that's
2 better for ratings.

3 Q Right. So do you recall who it was that
4 asked you to give that kind of information for a ring
5 character?

6 A It was -- I think it was at the Power
7 Plant. I think Sarge or Mike Wenner or maybe Jody
8 Hamilton. Jody Hamilton. I know that just one day at
9 the Power Plant they told us to do it.

10 Q And you wrote it down?

11 A Yeah, they had like a -- I think they had
12 like a sheet. I don't know if I wrote it or if I told
13 somebody, but I remember it. I remember that day.

14 Q And you recall this is -- this is a fairly
15 accurate reflection of the information you gave about
16 your ring character?

17 MS. ROTHENBERG-WILLIAMS: Objection,
18 vague. Are you asking him if everything on here was
19 information that he gave or . . .

20 MR. RICHARDSON: Well, let's try that
21 question.

22 Q Is everything on here information that you
23 gave?

24 A For the most part.

25 Q Is there anything on here that appears on

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1 A No.

2 Q Do you recall before the Power Plant was
3 moved there being tryouts held for contracts?

4 A I remember one day while I was there --
5 this might have been the tryout. I think this guy -- I
6 think his name was J.J. Dillon and Paul Orndorff and
7 them, they all came down there and we did some matches
8 for them. It's been a while back. I can't really be
9 specific like, okay, this was actually a tryout to go to
10 the new --

11 Q Do you have any idea -- did anyone give
12 you any indication at that time why they were there?

13 MS. ROTHENBERG-WILLIAMS: Objection,
14 vague. Why who was there?

15 Q BY MR. RICHARDSON: Why J.J. Dillon and
16 Paul Orndorff was there.

17 A They just said something like we got the
18 big brass coming out here today, you know, the big brass
19 of the company so -- well, they told us like maybe the
20 week before like that Monday and they came that Friday
21 or something. They was like, you know, pick a partner
22 and try to make a good match to impress them.

23 Q Who was your partner?

24 A It might be -- I don't know if he is Asian
25 or -- Poontong, Boontong (phonetic), something like

1 that.

2 Q Bounthan Saengsiphanh, Saengsiphanh?

3 A I --

4 Q I know who you are referring to.

5 A Yeah.

6 Q His name is difficult to pronounce. And
7 he's the one that you wrestled?

8 A That's who I did my match with.

9 Q During your time at W.C.W., did you have
10 any communications with J.J. Dillon or Paul Orndorff?

11 A Not other than that day they came there
12 then like some days we would -- they would take over to
13 the other school. You know, we would move stuff. Not
14 other than that.

15 Q During the times that you moved things to
16 the other school, did you ever have any conversations
17 with either of them?

18 A Not that I remember other than, you know,
19 want this room organized this way or something like that
20 because they were sort of standoffish, I thought.

21 Q What made you think they were standoffish?

22 A Never really said anything other than move
23 this, do that. And I would speak and, you know, they
24 would just nod their head or something.

25 Q Was there a day when someone at W.C.W.

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1 there, they said he had already started training before
2 I got there. But he would come every blue moon, so on
3 the days he would come I would say, oh, he's down here.
4 They would say yeah. I'd say I never seen him. They
5 would say he hardly ever comes, but I think he got a
6 contract, though. I am not sure, but I think so.

7 Q John Hugger, is he someone you trained
8 with?

9 A I don't remember the name.

10 Q Kevin Tilton, is he someone you trained
11 with?

12 A I don't remember that name.

13 Q What about Ice Train, do you believe he
14 got a contract?

15 A I think he did. I always thought he was
16 already under contract. I don't know.

17 Q Okay. Do you know who made the decision
18 regarding who would be offered contracts?

19 A I couldn't tell you that.

20 Q You have any idea what the decision to
21 offer contract was based on?

22 A No idea.

23 (Whereupon, the court reporter
24 marked Exhibit 3 for
25 identification.)

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1 A Yes.

2 Q You reviewed them with the instructors?

3 A Yes. Sometimes and sometimes, you know --
4 most times the first time you reviewed them with the
5 instructors then afterwards, you know, you could sit
6 there and watch them and critique them and see what you
7 need to work on, whatever, on your own.

8 Q Do you have any tapes --

9 A No.

10 Q -- of your wrestling?

11 A No.

12 Q Other than the training, were you ever
13 asked to do promotional or commercial work for W.C.W.?

14 A No, not that I can remember.

15 Q Were you ever paid by W.C.W. to perform
16 any service for them?

17 A I remember I got paid one time for, like I
18 say, moving some stuff. I think we had went over to the
19 new facility and worked a couple of days and they paid
20 us for that.

21 Q Who paid you? Do you recall who talked to
22 you about payment for this job?

23 A I think when we got over there, you know,
24 Sarge told us when we get over there go talk to
25 somebody. You know, they will show us, you know, where

1 to sign, put our name on the list as we were working
2 that day. I don't remember who the person was.

3 Q How much did you get paid?

4 A I can't remember.

5 Q How many hours did you get paid for?

6 A I don't remember that either.

7 Q Did you work a full day?

8 A I can't remember like exact, but I
9 remember getting paid one time for some work we had
10 done.

11 Q Did you get a W2 form from W.C.W. for the
12 work you did?

13 A I don't remember getting one.

14 Q At any time before or during your training
15 at W.C.W., did anyone from W.C.W. suggest to you that
16 you would be offered a contract with W.C.W.?

17 MS. ROTHENBERG-WILLIAMS: Objection.

18 Asked and answered.

19 THE WITNESS: Well, they never just said
20 you would be offered a contract but they would say just
21 keep working hard. You got potential. You should be
22 able to make some money in this business.

23 Q BY MR. RICHARDSON: When you decided to
24 train, did you think there was any guarantee that you
25 would make it?

1 Q Okay. Anything else other than that?

2 A No, it seems fairly accurate.

3 Q Okay. Take a look at -- while we are on
4 that page, take a look at Paragraph 28 on Page 10. I
5 will read it out loud and then I will ask you some
6 questions about it.

7 It says: Plaintiff paid the fee and trained at
8 the Power Plant full time for nearly a year, but was not
9 given an opportunity to wrestle. Instead, Plaintiff
10 Easterling, along with the other minority trainees, were
11 forced to perform menial labor like sweeping the
12 facility, putting up rings and other duties at the
13 direction of the white trainers.

14 Who forced you to perform menial labor?

15 A It was mostly like Sarge. You know, they
16 would say let's clean this up or let's move this, move
17 that.

18 Q Did you ever refuse?

19 A No.

20 Q Did you feel that you shouldn't -- that it
21 was not proper for you to be asked to do those things?

22 A I felt like, you know, we weren't getting
23 paid. It wasn't right. But I was willing to pay my
24 dues, so to speak.

25 Q Did you ever see anyone refuse?

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1 A Well, some of the guys, like a couple of
2 the white guys that were sort of cocky or whatever had
3 been there for a while, they would just sit there and
4 like pretty much not do anything.

5 Q Did you ever complain to anyone about some
6 people not participating?

7 A No, no more -- you know, just to the other
8 trainees. We would talk about it.

9 Q Did any white wrestlers ever sweep the
10 facility or put up rings or perform other duties like
11 that at the Power Plant?

12 A Yeah, sometimes.

13 Q Did any minority trainees ever refuse?

14 A Not that I can remember.

15 Q Do you recall who some of the white
16 wrestlers were who would not perform the things like
17 sweeping the facility, putting up rings and other
18 duties?

19 A I remember a couple of -- I remember this
20 one dude. I remember his name. His name was Chad
21 something and it was a couple of the guys that he sort
22 of hung out with. Like I hardly never saw them do
23 anything like that.

24 Q Do you know if anyone ever complained
25 about that?

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1 MS. ROTHENBERG-WILLIAMS: Okay. How long
2 do you want to take, 45 minutes?

3 MR. RICHARDSON: Forty-five minutes.

4 (A lunch recess was taken.)

5 MR. RICHARDSON: Okay. Back from our
6 break.

7 Q If you would -- if I could refer you back
8 again to your complaint, Paragraph 45 on Page 14. It
9 says: In violation of 42 USC, Section 1981, Defendants
10 refused to contract with plaintiff and refused to
11 provide plaintiff with opportunities for advancement
12 commensurate with similarly situated white wrestlers.

13 Are you claiming in this lawsuit that W.C.W.
14 refused to offer you a contract because of your race?

15 A I am saying they didn't. I am not saying
16 they refused. I never asked, but they didn't offer me
17 one.

18 Q And you believe that was because of your
19 race?

20 A Yes.

21 Q Who specifically did not give you a
22 contract because of your race?

23 A The only thing I -- the answer to that --
24 the answer I know is W.C.W. You are talking about a
25 person?

1 Q Right.

2 A See, I don't know exactly who would sit
3 down and say give you the contract.

4 Q Why do you believe you weren't given a
5 contract because of your race?

6 A Because of guys in a similar situation
7 like I was, they were Caucasian wrestlers. They got
8 contracts and I didn't.

9 Q What Caucasian wrestlers who were
10 similarly situated to you got contracts?

11 A Just to name a few, Chase Tatum, Mark
12 Millennium, Chuck Palumbo, a dude name Brett, who else.
13 Like Mike Sanders. People that was there when I was
14 there. Allen Funk. This dude named -- it was an
15 Italian dude. His name was Rick something but at the
16 wrestling school everybody called him Meatball, yeah,
17 Meatball, just to name a few. And another dude named
18 Johnny The Bull.

19 Q These were all people who you trained with
20 at the Power Plant at some time or another?

21 A Yes.

22 Q And how do you know that all of these
23 folks that you've named were given contracts?

24 A I don't know. I didn't actually see the
25 contract. Most of those guys I saw like on TV

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1 wrestling. Then some of the other guys, some of the
2 guys I kept in contact with, they went to the new school
3 with them.

4 Q When you say you saw them on TV, is this
5 after the Power Plant moved?

6 A Yes. For the most part I would say yes.

7 Q Chase Tatum, do you know whether he
8 wrestled at any point before he came to train at the
9 Power Plant?

10 A I don't know.

11 Q How about Mark Millennium?

12 A I don't know.

13 Q How about Chuck Palumbo?

14 A I don't know.

15 Q How about any of the others that you have
16 named you believe got contracts?

17 A I couldn't tell you.

18 Q Were there any white wrestlers who were
19 given contracts that you trained with at W.C.W. who you
20 believe were better than you?

21 A No.

22 Q Are there any who you believe were just as
23 good as you?

24 A Maybe. Like Chase, Chase Tatum and Chuck
25 because, you know, we all about the same stature and

1 stuff. That's why I am naming them.

2 Q What was it about Chase Tatum and Chuck
3 Palumbo's abilities that made you think that they were
4 about the same as yours?

5 A Because we were like bigger guys and we
6 did a lot of like power moves, like where some of the
7 smaller guys had to do the high flying acts and stuff.
8 You know, the bigger you are the lesser that you do.

9 Q Now Allen Funk, he was a smaller wrestler?

10 A Yes, right.

11 Q Do you believe that he was less qualified
12 than you to receive a contract because he was smaller?

13 A No, not because he was smaller. I am not
14 going to say that.

15 Q Do you think his size had some impact on
16 his qualifications to be a wrestler?

17 A I don't know.

18 Q Now some African-American wrestlers were
19 given contracts as well; is that right?

20 A Right.

21 Q I think you mentioned -- I think you
22 mentioned Marcial Davis?

23 A Yes.

24 Q I think you mentioned Ice Train?

25 A Yes.

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1 Q And Elix Skipper?

2 A Yes.

3 Q Do you know why those African-American
4 wrestlers would be given contracts and you weren't?

5 A I don't know why.

6 Q Isn't it possible that people at W.C.W.
7 didn't believe that you were as good as some of those
8 other people who were offered contracts?

9 A You say isn't it possible?

10 Q (Nods head affirmatively.)

11 A I don't know. You want to rephrase it or
12 something?

13 Q I mean, you think you weren't offered a
14 contract because of race; is that right?

15 A That's the main reason I think.

16 Q But don't you think there could have been
17 other reasons why you weren't offered a contract having
18 nothing to do with race?

19 A I mean, I'm not going to say there
20 couldn't be no other reason but that's the only reason I
21 could think of.

22 Q Now other than not being offered a
23 contract, were there any other opportunities for
24 advancement that you believe you were denied because of
25 race?

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1 then he didn't even finish the tryout. And the thing
2 was you had to finish the tryout in order to come back
3 to train, but he didn't finish. He came late and he got
4 invited back and he got a contract.

5 Q And do you know of any black wrestlers who
6 didn't finish the tryout but were invited a contract?

7 A Not that I know of.

8 Q Why do you believe that he was offered a
9 contract under those circumstances that had anything to
10 do with race?

11 A Like I said, no black person that didn't
12 finish, they couldn't even come back or they didn't come
13 back.

14 Q But that didn't affect you personally
15 because you did finish the tryout and were invited back?

16 A Yes, I did finish and I came back.

17 Q How else were you discriminated against by
18 W.C.W.?

19 A Well, like for instance while we were down
20 there at the Plant like moving stuff, it just seems like
21 they would like direct like the -- they would tell like
22 the black guys, "Y'all move these big tables and stuff
23 over here," and look like the little white guys was
24 moving like little white boxes and stuff instead of --
25 that's one way.

1 And then -- and like for instance, I guess this
2 is part of the question, too. Like one day it was
3 about -- I'd say about 12 of us in the ring or something
4 and Pez Whatley, which was a black instructor, he made a
5 comment and Sarge said, he said like -- he said
6 something to us like "Did y'all understand what he
7 said?" And a lot of the guys said no.

8 And he said like -- he said "I bet you East and
9 Davis" -- East is me, Davis is Marcial Davis -- he said,
10 "I bet you they know what he said," you know, implying
11 that we were the only two African-Americans around.
12 Then he asked, "Did y'all understand it?" We said yeah.
13 You know, they started laughing about that.

14 MR. RICHARDSON: Would you read back that
15 answer.

16 (Whereupon, the record was read by the
17 court reporter as follows:

18 Question: "Well, like for instance while
19 we were down there at the Plant like moving stuff, it
20 just seems like they would like direct like the -- they
21 would tell like the black guys, "Y'all move these big
22 tables and stuff over here," and look like the little
23 white guys was moving like little white boxes and stuff
24 instead of -- that's one way.

25 And then -- and like for instance, I guess

1 A Yes.

2 Q Did you ever tell him that, Sarge?

3 A No.

4 Q Did you ever tell Pez Whatley that?

5 A No, I don't think we ever -- I don't
6 remember if we did.

7 Q Take a look at Paragraph 43. It says: By
8 engaging in the unlawful conduct described herein,
9 Defendants acted intentionally, willfully and with
10 malice or reckless indifference to Plaintiff's federally
11 protected civil rights.

12 Is there anyone at W.C.W. who you believe acted
13 intentionally, willfully and with malice or reckless
14 indifference to your rights?

15 A I can just give you examples of stuff that
16 went on. I don't know if they was intentionally or not
17 but I can give you examples.

18 Q Okay, if you would.

19 A Just one day we were all in the ring and
20 we were making reference to a match the night before on
21 TV. It was a -- Booker T had done a match, and we were
22 talking about it and Sarge said Booker T gets one of the
23 best pops out of the crowd than anyone in this industry.
24 And he said I don't know why they don't push him more,
25 and one of the guys said something like -- well, they

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1 said this: You think it's because of his super tan?
2 And Sarge looked around and said, Well, it doesn't take
3 a scientist to figure out everything. And the super tan
4 was referring to his skin color.

5 Q Do you recall who made the comment about
6 the super tan?

7 A I don't remember. It was a lot of us in
8 there.

9 Q At that point in time did you have any
10 idea who made the decision as to which wrestlers would
11 be pushed?

12 A At that time did I? I just -- no, I
13 didn't really know.

14 Q That led you to believe that someone at
15 W.C.W. was intentionally holding Booker T back?

16 A I am just taking the statement for what
17 it's worth. Because he had a super tan, so to speak, he
18 wouldn't get the push he should have gotten.

19 Q Okay. What other examples can you tell
20 me?

21 A It's like, for instance, a guy, Chuck
22 Palumbo, we like the same size and everything. I think
23 he might have started a week earlier than I did actually
24 training, but you could just see like they just worked
25 with him more. Him and like some of the other white

1 wrestlers, they just worked with him more. Really, like
2 me and Davis and other like black wrestlers, we just --
3 they sort of like tell us go over in the other ring and
4 work on, you know, basic stuff. That's one example.

5 And also the guy that used to work with Chuck a
6 lot who was a trainee, I think he was a Samoan guy,
7 Sonny, G.Q. Sonny, that's what we called him -- Sonny
8 G.Q. I mean, they did everything together, all the moves
9 and stuff, but I don't know. But I know he got a
10 contract at a new school but they terminated him. I
11 don't think they never terminated Chuck.

12 THE REPORTER: I'm sorry. You don't think
13 what?

14 THE WITNESS: They never terminated Chuck
15 Palumbo.

16 Q BY MR. RICHARDSON: Now this Sonny that
17 you are referring to, is he Asian?

18 A If I am not mistaken he's Samoan.

19 Q Samoan?

20 A Yeah.

21 Q Sakai or Siaki?

22 A I don't know.

23 Q Okay.

24 A And who else. This guy Mark Millennium,
25 he was a tall cat. He was a tall, slender cat, but he

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1 was, you know, taller, maybe a inch taller than me. And
2 he couldn't, to me -- he was a good guy, but he didn't
3 really, to me -- I know he didn't do more than I could
4 do and he got a contract.

5 Q Any other examples you can tell me?

6 A Yeah. Like this guy Lash LaRue, you know,
7 I am comparing him to like guys like Hardbody and
8 another guy that was down there, Joseph, Joseph Watkins
9 and I think it was a guy named Charles Young. You know,
10 I am just going with him because he about the same size.
11 They could actually do more than him, I thought, but
12 they -- like I say, Joseph Watkins and Charles Young,
13 they never got a contract. And Hardbody, I think he got
14 -- his contract was less than Lash LaRue, and I know
15 Lash had got a contract before Hardbody. I know that.

16 Q Any other examples?

17 A Let me think. I guess like Sarge, he
18 wouldn't too much work with us but any chance or
19 opportunity seem like if he got to talk down or
20 embarrass us. Like for instance, he would be working
21 with them in this ring. We would be over in the other
22 ring working. He wouldn't hardly say nothing to us but
23 if he looked over there and saw us doing something
24 wrong, he wouldn't say like you should do it like this.
25 He would just scream something like "That looks like

1 shit," you know, talk down on you. Seem like every
2 chance he got an opportunity to talk down on you or
3 something like that, he would do it.

4 Q How often do you think Sarge made those
5 kind of comments like that looks bad or you are not
6 doing that right?

7 A I don't remember. Like I say, that was
8 years ago. I just remember him saying that like a few
9 times. I don't know how many times. I just remember
10 saying to myself, well, why don't he work with me
11 instead of just criticizing.

12 Q You ever hear him make those kind of
13 comments to white wrestlers?

14 A Not that I remember. I am not saying he
15 didn't, but I don't remember.

16 Q Any other examples?

17 A I am just thinking. Oh, yes. I think
18 this might be part of it, too.

19 One night they had a taping at the Monday night
20 Nitro and I was down there. Did I already say this? I
21 don't think so.

22 And while I was there, some white dude, like he
23 might have been in his forties, I think he was a
24 cameraman. He was part of the production crew. I know
25 that. I think it was a cameraman. He came up to me,

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1 you know, asked me my name and stuff. He said, Man, you
2 got a look. I think you could do okay in this industry.
3 And I said okay. And he said, Well, let me tell you
4 something. He pulled me to the side. He said, Well,
5 you got some of these good 'ol boys that's been here a
6 while. You know, they might call you the N word. And
7 he said like Owen Anderson. That was one of the names
8 he used. He said, if they do, just let it slide. You
9 know, just keep your mouth shut and just do what you got
10 to do to move on up.

11 Q Do you remember this cameraman's name?

12 A No, I don't remember it.

13 Q Did anyone at W.C.W. ever call you the N
14 word?

15 A Not that I heard it.

16 Q Had you ever -- while you were at W.C.W.,
17 did you ever hear anyone use the N word?

18 A I can't remember.

19 Q Any other examples?

20 A That same night at that Pay-Per-View while
21 I was down there, Hardbody Norris, he walked up and I
22 was asking him just some stuff about wrestling. Then
23 when he walked off, some guy came up to me -- I am
24 trying to see who it might have been. It was one of the
25 white wrestlers that was -- I think was under contract

1 that was already wrestling and he said to me, Hey,
2 that's not a good person to be seen talking to. So I
3 left it at that. I didn't know what they were talking
4 about, but I left it at that.

5 Q Do you remember who this white wrestler
6 was?

7 A No. Like I said, I don't remember.

8 Q Okay. Any other examples?

9 A Off the top of my head, I can think of
10 like comparative speaking like that dude, Mike Sanders,
11 he got a contract which was more than Hardbody, and like
12 Joseph Watkins and this guy Charles Young, they didn't
13 get one and they were more agile and stuff than him.

14 Q How do you know that Mike Sanders'
15 contract was more?

16 A Than Hardbody?

17 Q Yeah.

18 A I don't know exactly but that's word of
19 mouth that it was.

20 Q Okay.

21 A Because I never actually sat down and read
22 anybody's contract.

23 Q Right. Any other examples?

24 A I feel like -- what's the question again?
25 I just been talking so long.

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1 Q We started off talking about who you
2 believe acted intentionally, willfully and with malice
3 and I think the answer was, well, here are some
4 incidents.

5 A Okay.

6 Q You know, I just took it for what it was,
7 if I am characterizing it correctly, and you started to
8 give me some examples of incidents that you had heard
9 about.

10 A That's all I am thinking of right now. If
11 I can think of some more, if they come to me, I'll tell
12 you more.

13 Q Okay. All of the incidents that we have
14 talked about so far, did you ever complain to anyone at
15 W.C.W. about that?

16 A Just talked amongst the trainees.

17 Q Just the trainees?

18 A Right.

19 Q Now Paragraph 46 of your complaint, it
20 says: In violation of 42 USC, Section 1981, Defendants
21 fostered and encouraged a hostile work environment
22 wherein plaintiff and other minorities suffered severe
23 and pervasive hostility in the form of racial slurs,
24 jokes and other sanctioned debasement.

25 I think we talked already about the N word. Were

1 you subjected to any other racial slurs?

2 A Not that I can remember.

3 Q Did you ever hear anything that you
4 perceived to be a racial slur?

5 A I mean like they would say some stuff. I
6 can't remember like the exact words, but I know it was
7 more than what I named, but I just didn't -- just a
8 couple of things stand out in your head but I just can't
9 exactly tell you. It was happening all the time, it
10 seems like.

11 Q Do you recall anything that any of the
12 trainers said or did -- well, let me ask it this way.

13 Do you recall any of the trainers ever saying
14 something that you perceived to be a racial slur?

15 A I can't remember other than like some
16 incidents I named earlier.

17 Q Okay. How about racial jokes, did you
18 ever hear any racial jokes being told at W.C.W.?

19 A I just remember one day, I think it might
20 have been Tony Carr or something, he sort of like walked
21 around the corner and he was like -- he said something
22 like, Man, them S.O.B.'s around there making jokes. I
23 said, What kind of jokes they making? They really
24 racial, he was like. He didn't tell me the exact joke,
25 but he was like -- that's why he was upset.

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1 Q And who told you that?

2 A A guy named Tony Carr.

3 Q But you didn't hear it yourself?

4 A No.

5 Q Any other discriminatory remarks or
6 treatment that you heard other than what we have already
7 talked about?

8 A None I can think of right at this minute.

9 Q You believe your work environment was
10 hostile?

11 A Yes.

12 Q Why do you believe your work environment
13 was hostile?

14 A Because of the things I had stated earlier
15 and with me being black and they being white. They were
16 white, they were running the facility so it was like I
17 couldn't say anything or complain because around there,
18 you were like on egg shells. Like don't complain or
19 anything. Just do what you got to do to try to advance.

20 Q Wasn't Pez Whatley a trainer?

21 A Yes.

22 Q Did you ever complain to Pez Whatley?

23 A No, but now that we are sitting here, the
24 more that we talk, I know a lot of times seem like they
25 would explain a move or something, Pez like explaining a

1 A Say it again.

2 Q Other than what we've talked about
3 relating to your claims of discrimination, is there
4 anything that W.C.W. did to you that you believe is
5 intentional infliction of emotional distress?

6 A I don't know if it was intentional, but it
7 was distress, not given the opportunities to make a
8 living, to make decent money.

9 Q So part of it was not being offered a
10 contract?

11 A Right.

12 Q And you believe that was on the basis
13 of -- and that was because of discrimination?

14 A Yes.

15 Q Okay. Anything else that you think was
16 intentional infliction of emotional distress?

17 A No, not given the opportunity, not given a
18 contract to wrestle like -- not given like opportunity
19 for like concessions, you know, like T-shirts and all
20 that type of stuff. Is that what you are looking for?

21 Q I just want to know what you think --

22 A Okay.

23 Q -- what you think your claims are, what
24 your belief is that is intentional infliction of
25 emotional distress.

1 Q If you think of any, I would like you to
2 tell me.

3 A (Witness nods head affirmatively.)

4 Q Let's take a look at Page 16. At the top
5 it says: Count 3, failure to pay the minimum wage as
6 required by F.L.S.A., Fair Labor Standards Act.

7 Can you put a number of hours, can you give me a
8 number of hours you worked, you believe you worked, that
9 you were not paid minimum wage?

10 A I can't give you a straight number, but
11 just about every day when we got there we had to clean
12 up, move stuff around, so I can't really say.

13 Q And you believe that you should be paid
14 minimum wage for the time you spent cleaning and moving
15 things around at the -- when you were training?

16 A Yes.

17 Q Can you give an estimate of how many hours
18 a week that was?

19 A It's so long, I can't really remember. I
20 am trying to think. I can't remember.

21 Q Can you think of anything that you could
22 use to refresh your recollection?

23 A Well, the only thing I could do is like
24 guesstimate, but I don't have any written documentation.

25 Q Can you try and guesstimate now?

1 MS. ROTHENBERG-WILLIAMS: I see the court
2 reporter kind of straining to hear your voice, so if you
3 could try to speak up just a little bit more, it might
4 make her job a little easier.

5 THE WITNESS: Okay.

6 Q BY MR. RICHARDSON: What qualities do you
7 need to be a successful professional wrestler?

8 A What I believe?

9 Q Yes.

10 A Charisma, I think size, athletic ability
11 and the will to work hard.

12 Q Why is charisma important?

13 A To get a bigger draw. In other words, you
14 know, just to make people want to watch you on TV for
15 ratings.

16 Q You think acting ability is important?

17 A Yes, I mean, that's pretty much what it
18 is. It's like a -- I want to say like a physical soap
19 opera.

20 Q Do you have to be able to convince the
21 audience that what's happening is really happening?

22 Would you agree with that?

23 A Yes.

24 Q How about speaking ability? Do you think
25 that's important?

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1 A Yes. It just depends on your character.

2 Q Other than the information you were asked
3 to give when you were asked to come up with a character
4 during your training at W.C.W., was there any other
5 discussion or training with regard to a ring character?

6 A Not that I can remember.

7 Q Did you ever practice giving interviews or
8 talking on microphone?

9 A I did at home in the mirror.

10 Q How about imagination or inventiveness, do
11 you think those are important qualities being a
12 professional wrestler?

13 A Yes, that's important because you have to
14 get a gimmick, a good gimmick in order to get your
15 character over.

16 Q While you were training with W.C.W., did
17 W.C.W. ever -- did anyone from W.C.W. ever give
18 wrestlers gimmicks or suggest gimmicks or characters to
19 wrestlers?

20 A I didn't actually hear them give anybody
21 one, but I am sure they did. But I didn't actually hear
22 them.

23 Q But no one ever suggested a gimmick or a
24 character to you?

25 A No.

1 A No.

2 Q Taking any medications for depression?

3 A No.

4 Q Or for the distress that you feel?

5 A No.

6 Q Have you paid your attorneys any money to
7 represent you in this case?

8 A No, no.

9 Q Do you have an arrangement with your
10 attorneys as to how you are going to be paid -- as to
11 how they are to be paid for representing you in this
12 lawsuit?

13 A Yes.

14 Q Is that arrangement in writing?

15 A Yes.

16 Q Is it your understanding that you are
17 paying your lawyers by the hour or that they would get
18 some percentage of whatever amount you recovered in this
19 lawsuit?

20 A Percentage.

21 MS. ROTHENBERG-WILLIAMS: Good time to
22 take a two-minute break?

23 MR. RICHARDSON: Yes.

24 (A recess was taken.)

25 Q BY MR. RICHARDSON: Mr. Easterling, since

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1 you stopped training with W.C.W., have you looked for
2 alternative employment in the wrestling industry?

3 A No.

4 Q Where have you worked since you stopped
5 training with W.C.W.?

6 A For the most part, I work at Stokers,
7 security at Stokers for two years, and now I work at
8 this place called Dream Girls, security.

9 Q Is Dream Girls a club?

10 A Adult entertainment.

11 Q When did you stop working Stokers and
12 start working at Dream Girls?

13 A I stopped working at Stokers like March
14 of 2001 and in between there I worked at Club Nicky's
15 and the Gentlemen's Club before I started working at
16 Dream Girls. But those two clubs closed down so now I
17 work at Dream Girls.

18 Q So from early '99 to approximately
19 March 2001 you were at Stokers?

20 A Yes.

21 Q Okay. Any other jobs you have had since
22 you stopped training at W.C.W.?

23 A No.

24 Q How much did you make at Stokers
25 security?

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

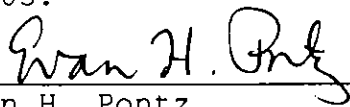
DARRON EASTERLING,)	
)	
Plaintiff,)	
)	CIVIL ACTION FILE
v.)	
)	NO. 1:00-CV-1715-CC
WORLD CHAMPIONSHIP WRESTLING, INC.,)	
TURNER SPORTS, INC. and TURNER)	
BROADCASTING SYSTEM, INC.,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of
this **APPENDIX OF DEPOSITION EXCERPTS** upon the interested parties
by hand delivery to:

Cary Ichter
Kelly Jean Beard
Charles Gernazian
Michelle M. Rothenberg-Williams
MEADOWS, ICHTER AND BOWERS, P.C.
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This 30th day of January, 2003.



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